

EXHIBIT 2

October 14, 2025

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

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IN RE: UBER TECHNOLOGIES, INC.
PASSENGER SEXUAL ASSAULT LITIGATION

Case no. 3:24-cv-07019-CRB
Case no. 3:24-cv-07821
Case no. 3:24-cv-7940
Case no. 3:23-cv-06708
Case no. 3:24-cv-04900
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*** HIGHLY CONFIDENTIAL ***

VOLUME II
VIDEOTAPED DEPOSITION
OF
SUNNY WONG
TUESDAY, OCTOBER 14, 2025

Reported by:
CANDIDA BORRIELLO
Stenographic Reporter
JOB NO. 6989788-001

October 14, 2025

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2 other than S-RAD to try to avoid pairings
3 that had a high risk for sexual assault or
4 sexual misconduct?

5 A. Not that I know of.

6 Q. And you're speaking on behalf of
7 Uber on this very topic today, right?

8 A. Correct.

9 Q. So when you say "not that I know
10 of," I just want to clarify for the jury it's
11 not that Uber knows of, there is no other
12 program, right?

13 A. Correct.

14 Q. So you cannot tell the jury how
15 many other potential pairings were available
16 that Uber could've selected for -- selected
17 from for Jaylynn that night, right?

18 MR. PREMO-HOPKINS: Object to
19 form.

20 A. Yeah, I don't have the other plan
21 scores. In this hypothetical, all the other
22 scores are lower than the score of that for
23 that particular trip. It's possible that the
24 Jaylynn Dean trip had the lower score of the
25 ones that are available, right. So I also

October 14, 2025

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2 MR. PREMO-HOPKINS: Object to

3 scope.

4 A. Yeah, I'm able to see that.

5 Q. Okay. You can just leave that

6 there for a second.

7 Did Uber find Ms. Dean,

8 Jaylynn Dean, the safest match possible on

9 November 15, 2023?

10 MR. PREMO-HOPKINS: Object to

11 form. Scope.

12 A. Again, I have no idea about that

13 since I don't have visibility into the other

14 plans available at that time. All we know is

15 that the trip wasn't flagged based on the

16 threshold we set.

17 Q. Right. And because the trip wasn't

18 flagged based on the threshold Uber set, Uber

19 took no further action to try to find the

20 safest match possible for Jaylynn because

21 whether there were other safer rides or not

22 was not relevant so long as they were below

23 the threshold Uber set, right?

24 MR. PREMO-HOPKINS: Object to

25 form. Scope.

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2 Q. You can't say as the head of Uber's
3 data science team that addresses safety that
4 the middle of the night is a more dangerous
5 time of day with respect to sexual assault
6 and sexual misconduct?

7 MR. PREMO-HOPKINS: Object to
8 form. Scope.

9 A. I mean, again, we know it's a
10 nighttime trip and we know that trip hour
11 were one of the most important features.

12 So what's your specific question?

13 Q. Can you, as the person that's in
14 charge of the data science team that
15 addresses the risk of sexual assault and
16 sexual misconduct, affirm for the jury that
17 the middle of the night is a more high risk
18 time for sexual assault and sexual misconduct
19 than daytime?

20 MR. PREMO-HOPKINS: Object to
21 form. Scope.

22 A. I -- again, I can't say. I don't
23 have the rates in front of me. But I imagine
24 nighttime in general, even outside of Uber,
25 is likely more risky than daytime, right.

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2 C E R T I F I C A T E

3

4 STATE OF NEW YORK)
5 : SS.:
6 COUNTY OF RICHMOND)

7

8 I, CANDIDA BORRIELLO, a Stenographic
9 Court Reporter and Notary Public for and within
10 the State of New York, do hereby certify:

11 That the witness, SUNNY WONG, whose
12 examination is hereinbefore set forth was duly
13 sworn and that such examination is a true record
14 of the testimony given by that witness.

15 I further certify that I am not related
16 to any of the parties to this action by blood or
17 by marriage and that I am in no way interested in
18 the outcome of this matter.

19 IN WITNESS WHEREOF, I have hereunto set
20 my hand this 14th day of October, 2025.

21



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CANDIDA BORRIELLO

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